

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION RECEIVED
WASHINGTON, D.C. 20268-0001
JAN 28 4 50 PM '98

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
UNITED PARCEL SERVICE
(USPS/UPS-2)

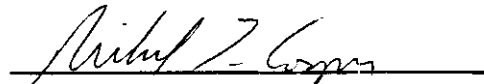
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatory and request for production of documents to the United Parcel Service: USPS/UPS-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



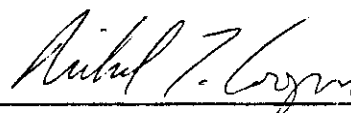
Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
January 28, 1998

USPS/UPS--2. Please provide data showing United Parcel Services' market share in the overnight, two-day, and ground package delivery markets. Please provide market share data by volume and revenue. Please provide the information separately for the following products: UPS Next Day Air, UPS Next Day Air Early A.M., UPS Next Day Air Saver, UPS 2nd Day Air, UPS 2nd Day Air A.M., UPS 3 Day Select, UPS Ground (residential), and UPS Ground non-residential). Please provide the data for the period covering GFY 1996, October 1, 1995 through September 1996 and GFY 1997, October 1, 1996 through September 30, 1997. If the information is not available for the periods requested, please provide the data aggregated for the most recently available twelve month period.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, reading "Richard T. Cooper", written over a horizontal line.

Richard T. Cooper

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January 28, 1998